

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NORTH DAKOTA**

In re:

EPIC Companies Midwest, LLC,
EPIC Companies Midwest 2023, LLC,
EPIC Employee, LLC,
EOLA Capital, LLC, and
EC West Fargo, LLC,

Debtors.

Jointly Administered

Bankruptcy No. 24-30281
Bankruptcy No. 24-30282
Bankruptcy No. 24-30283
Bankruptcy No. 24-30284
Bankruptcy No. 24-30285

Chapter 11

**NOTICE OF ELEVENTH APPLICATION OF STINSON LLP FOR
ALLOWANCE OF FEES AND EXPENSES AS COUNSEL
FOR THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS
FROM JUNE 1, 2025, THROUGH JUNE 30, 2025**

TO: The parties-in-interest as specified in the Notice and Service Requirements adopted pursuant to Local Rule 2002-1 and the Court's Order limiting notice pursuant to Fed. R. Bankr. P. 2002(i). [Dkt. No. 124.]

1. **NOTICE IS HEREBY GIVEN** that Stinson LLP, as counsel for the Official Committee of Unsecured Creditors, has filed its eleventh application for allowance of fees and expenses, a copy of which is attached hereto and served upon you.

2. **NOTICE IS FURTHER GIVEN** that any objection to the application must be filed with the Clerk of the United States Bankruptcy Court, whose address is Quentin N. Burdick Courthouse, 655 First Avenue North, Suite 210, Fargo, North Dakota 58102, and served upon the attorney whose name and address is listed below, by **August 21, 2025, which is twenty-one (21) days from the date of the filing of this Notice, excluding holidays**. Any objections not filed and served may deemed waived.

Dated: July 31, 2025

/s/ Benjamin J. Court

Benjamin J. Court (ND #07776)
Christopher J. Harayda (MN #0390333)
Samantha J. Hanson-Lenn (MN #0402035)

STINSON LLP

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**COUNSEL TO THE OFFICIAL
COMMITTEE OF UNSECURED
CREDITORS.**

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NORTH DAKOTA**

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Chapter 11

**ELEVENTH APPLICATION OF STINSON LLP FOR ALLOWANCE OF FEES AND
EXPENSES AS COUNSEL FOR THE OFFICIAL COMMITTEE OF UNSECURED
CREDITORS FROM JUNE 1, 2025, THROUGH JUNE 30, 2025**

1. Stinson LLP (“Stinson”) makes this Eleventh Application for allowance of fees for professional services rendered and for reimbursement of expenses incurred as counsel for the Official Committee of Unsecured Creditors (the “Committee”) of EPIC Companies Midwest, LLC, EPIC Companies Midwest 2023, LLC, EPIC Employee, LLC, EOLA Capital, LLC, and EC West Fargo, LLC (collectively, the “Debtors”) pursuant to 11 U.S.C. § 330.

2. In support of this Application, Stinson respectfully states as follows:

JURISDICTION

3. This Court has jurisdiction over this Application pursuant to 28 U.S.C. §§ 157 and 1334 and Fed. R. Bankr. P. 5005. This a core proceeding pursuant to 28 U.S.C. § 157(b). Venue is proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409. The petitions commencing these Chapter 11 cases were filed on July 8, 2024 (the “Petition Date”). The cases are currently pending before this Court.

4. This Application arises under 11 U.S.C. §§ 503(b)(2), 328(a), 330, 331, and 1103. This Application is filed under Fed. R. Bankr. P. 2016 and 2002(a)(6). Notice of this Application

is provided pursuant to the Federal Rules of Bankruptcy Procedure, the Notice and Service Requirements adopted pursuant to Local R. 2002-1, and the Court's Order limiting notice pursuant to Fed. R. Bankr. P. 2002(i). [Dkt. No. 124.]

BACKGROUND

5. On July 30, 2024, the Office of the United States Trustee appointed the Committee. [Dkt. No. 58.]

6. On August 7, 2024, the Committee selected Stinson to serve as its bankruptcy counsel, subject to court approval. On August 13, 2024, the Committee filed the Application to Employ Stinson LLP as Counsel to the Official Committee of Unsecured Creditors (the “Application to Employ”). [Dkt. No. 69.] The Court granted the Application to Employ, effective August 7, 2024, on August 30, 2024, via docket text (the “Order Approving Application to Employ”). [Dkt. No. 101.] A copy of the Order Approving Application to Employ is attached as

Exhibit A.

7. Pursuant to the Order Approving the Application to Employ, the Court also granted Stinson the authority to apply for fees and expenses pursuant to the Order Establishing Procedures for Interim Compensation and Reimbursement for Expenses for Retained Professionals (the “Order Establishing Fee Application Procedures”) [Dkt. No. 72]. The Order Establishing Fee Application Procedures is attached as **Exhibit B.**

8. This is Stinson's eleventh application for compensation under 11 U.S.C. § 331. Stinson's filed its first application on September 16, 2024 (the “First Application”); its second application on November 7, 2024 (the “Second Application”); its third application on December 2, 2024 (the “Third Application”); its fourth application on December 30, 2024 (the “Fourth Application”); its fifth application on February 6, 2025 (the “Fifth Application”); its sixth

application on February 25, 2025 (the “Sixth Application”); its seventh application on April 4, 2025 (the “Seventh Application”); its eighth application on May 2, 2025 (the “Eighth Application”); its ninth application on June 2, 2025 (the “Ninth Application”); and its tenth application on June 25, 2025 (the “Tenth Application”). [Dkt. Nos. 109, 160, 179, 202, 219, 237, 265, 282, 333, and 392.] The Court has approved all ten Applications as follows: 1) for the First Application, the Court approved \$42,776.50 in fees and \$1,953.04 in expenses for a total of \$44,729.54 on October 21, 2024; 2) for the Second Application, the Court approved \$40,957.50 in fees and \$2,661.88 in expenses for a total of \$43,619.38 on December 4, 2024; 3) for the Third Application, the Court approved \$11,882.00 in fees on December 27, 2024; 4) for the Fourth Application, the Court approved \$16,105.50 in fees on January 27, 2025; 5) for the Fifth Application, the Court approved \$6,188.50 in fees on March 4, 2025; 6) for the Sixth Application, the Court approved \$18,631.50 in fees on March 25, 2025; 7) for the Seventh Application the Court approved \$16,390.50 in fees on May 1, 2025; and 8) for the Eighth Application the Court approved \$19,036.50 in fees and \$570.25 in expenses for a total of \$19,606.75 on May 28, 2025; 9) for the Ninth Application the Court approved \$8,734.50 in fees on June 24, 2025; and 10) for the Tenth Application the Court approved \$10,285.50 in fees on July 17, 2025. [Dkt. Nos. 149, 181, 201, 217, 239, 264, 279, 327, 389, and 403.]

RELIEF REQUESTED

1. **Fees and Expenses.** By this Application, Stinson requests allowance of fees for professional services rendered during Debtors' Chapter 11 cases between June 1, 2025, to June 30, 2025, in the amount of **\$20,750.50**, and reimbursement of expenses in the amount of **\$2,021.74**, for a total of **\$22,772.24**

2. The professional services rendered by Stinson are detailed on the attached **Exhibit**

C. Those services include the tasks specifically described below:

(Task Code: B100 and B110) Case Administration: \$1,741.00

Services include reviewing and analyzing court filings including the monthly operating reports, preparing exhibits and finalizing filings with the Court, including ensuring all court orders and local rules are followed, and coordinating the unsecured creditors meeting held in Fargo.

<u>Name</u>	<u>Hours</u>	<u>Year</u>	<u>Hourly Rate</u>	<u>Fees</u>
Benjamin J. Court	0.2	2025	\$565	\$113.00
Christopher J. Harayda	0.2	2025	\$565	\$113.00
Shelby E. Kostolni	3.5	2025	\$395	\$1,382.50
Stephanie Hess	0.5	2025	\$265	\$132.50
TOTAL	4.4			\$1,741.00

Blended Hourly Rate:	\$395.68
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(Task Code: B120) Asset Analysis and Recovery: \$0.00

(Task Code B150) Meetings of and Communications with Creditors: \$10,764.00

Services include participating in various conferences with the Committee to evaluate and provide advice regarding Chapter 11 Plan and Debtors' recovery options, settlements, and status updates; reviewing and responding to various questions from creditors regarding Chapter 11 Plan; engaging in various communications via email and phone with creditors regarding the status of case, bankruptcy process, and new filings in the case; attending and participating in an in-person meeting in Fargo for all unsecured creditors to provide a status update to unsecured creditors on the Chapter 11 Plan and Disclosure Statement.

<u>Name</u>	<u>Hours</u>	<u>Year</u>	<u>Hourly Rate</u>	<u>Fees</u>
Benjamin J. Court	5.2	2025	\$565	\$2,938.00
Christopher J. Harayda	8.3	2025	\$565	\$4,689.50
Miranda S. Swift	6.3	2025	\$385	\$2,425.50
Shelby E. Kostolni	1.8	2025	\$395	\$711.00
TOTAL	21.6			\$10,764.00

Blended Hourly Rate:	\$498.33
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(B160 and 170) Employment Applications and Fee Applications: \$1,014.00

Services include preparing Fee Applications and evaluating issues regarding Fee Applications.

Name	Hours	Year	Hourly Rate	Fees
Benjamin J. Court	0.4	2025	\$565	\$226.00
Shelby E. Kostolni	1.8	2025	\$395	\$711.00
Miranda S. Swift	0.2	2025	\$385	\$77.00
TOTAL	2.4			\$1,014.00

Blended Hourly Rate:	\$422.50
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(B190) Other Contested Matters: \$118.50

Services include reviewing updated pleadings in adversary proceedings and analyzing issues regarding defenses in adversary proceedings; and preparing summary of adversary proceedings and settlements for Committee.

Name	Hours	Year	Hourly Rate	Fees
Shelby E. Kostolni	0.3	2025	\$395	\$118.50
TOTAL	0.3			\$118.50

Blended Hourly Rate:	\$395.00
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(B300 and B310) Claims Administration: \$79.00

Services include reviewing the claims transfers and updating the Committee.

Name	Hours	Year	Hourly Rate	Fees
Shelby E. Kostolni	0.2	2025	\$395	\$79.00
TOTAL	0.2			\$79.00

Blended Hourly Rate:	\$395.00
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(B320) Plan/Disclosure Statement Incl. Bus Plan: \$7,034.00

Services include reviewing and analyzing the Debtors' drafted modification to Disclosure Statement, reviewing and analyzing objections to Disclosure Statement; preparing for and participating in hearing on approval for Disclosure Statement; Communicating with and providing advice to Committee regarding Disclosure Statement and Plan confirmation issues; and Communicating with Debtors' counsel regarding Disclosure Statement and Plan.

Name	Hours	Year	Hourly Rate	Fees
Benjamin J. Court	2.8	2025	\$565	\$1,243.00
Christopher J. Harayda	9.5	2025	\$565	\$5,367.50

Miranda S. Swift	1.1	2025	\$385	\$423.50
TOTAL	12.8			\$7,034.00

Blended Hourly Rate:	\$549.53
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TOTAL FEES: \$20,750.50

3. **Reimbursement of Expenses.** In the course of this representation, Stinson has incurred **\$2,021.74** in expenses detailed in **Exhibit C**. The expenses relate to an in-person unsecured creditors meeting in Fargo to provide unsecured creditors with a status update of the case, including regarding the Disclosure Statement and Plan.

TOTAL EXPENSES: \$2,021.74

4. All services for which fees are requested by Stinson were performed for and on behalf of the Committee, and not on behalf of the Debtors or other persons.

LEGAL BASIS

5. This Court is authorized to award to professional persons employed by section 1103 of the Bankruptcy Code “reasonable compensation for actual, necessary services rendered by the ... attorney[s] and by any paraprofessional person[s] employed by any such person, and ... reimbursement for actual, necessary expenses.” 11 U.S.C. § 330. The Court must consider the nature, extent, and value of such services, taking into account all relevant factors to determine whether the request for payment in connection with such services is fair and reasonable. *Id.* The services Stinson provided pursuant to this Eleventh Application were actual, reasonable, and necessary services on behalf of the Committee, and not on the behalf of any other persons, and the fees and expenses requested in this Application are fair and reasonable under the circumstances of this case.

WHEREFORE, Stinson respectfully requests that the Court enter an order:

- A. Allowing Stinson's fees incurred between June 1, 2025, and June 30, 2025, in the amount of **\$20,750.50**, and reimbursement of expenses in the amount of **\$2,021.74**, for a total of **\$22,772.24**.
- B. Authorizing and directing the Debtors to pay Stinson such allowed fees and expenses;
- C. Granting administrative expense priority to Stinson's allowed fees and expenses; and
- D. Granting such other and further relief as may be just and proper.

Dated: July 31, 2025

/s/ Benjamin J. Court

Benjamin J. Court (ND #07776)
Christopher J. Harayda (MN #0390333)
Samantha J. Hanson-Lenn (MN #0402035)
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**COUNSEL TO THE OFFICIAL
COMMITTEE OF UNSECURED
CREDITORS.**

AFFIDAVIT

I, Benjamin J. Court, an attorney at the law firm of Stinson LLP, declare under penalty of perjury that the foregoing Eleventh Application of Stinson LLP for Allowance of Fees and Expenses as counsel for the Official Committee of Unsecured Creditors from June 1, 2025, through June 30, 2025, is true and correct according to the best of my knowledge, information, and belief.

Dated: July 31, 2025

/s/ Benjamin J. Court

Benjamin J. Court

EXHIBIT A

Docket Text:

Order Approving Application to Employ Benjamin J. Court and Stinson LLP as counsel for the Official Committee of Unsecured Creditors Effective August 7, 2024 (Related Doc # [69]). The application to employ is APPROVED subject to the limitations on compensation provided by 11 U.S.C. § 328. This order is not a determination that the services or rates charged are necessary and reasonable. The person or entity employed under this order shall file a fee application in accordance with the Bankruptcy Code and Federal Rules of Bankruptcy Procedures. See Fed. R. Bank. P. 2016, 2017 and 11 U.S.C. §§ 329, 330. Applicant must also comply with Local Rules. Applicant is also granted authority to apply for fees and expenses pursuant to #[72] Order Establishing Procedures for Interim Compensation and Reimbursement for Expenses for Retained Professionals. As required by applicable federal rule or statute, the Movant shall serve this docket text only order on all appropriate parties that will not receive notice of electronic filing. By Judge Shon Hastings. (Text order only). Signed on 08/30/2024 (vck)

EXHIBIT B

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NORTH DAKOTA**

In re:

EPIC Companies Midwest, LLC,
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Debtors.

Jointly Administered

Bankruptcy No. 24-30281
Bankruptcy No. 24-30282
Bankruptcy No. 24-30283
Bankruptcy No. 24-30284
Bankruptcy No. 24-30285

Chapter 11

**ORDER ESTABLISHING PROCEDURES FOR INTERIM COMPENSATION AND
REIMBURSEMENT OF EXPENSES FOR RETAINED PROFESSIONALS**

Debtors filed a Motion for an Order (I) Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals and (II) Granting Related Relief. Doc. 11. Pursuant to the notice of the Motion [Doc. 16], objections to the Motion were due by July 30, 2024.

Debtors served notice of the Motion. The Court received no objections to the Motion. The Court held a hearing on the Motion on August 14, 2024. Based upon the Motion and the Declaration of Patrick Finn [Doc. 6] and for the reasons stated on the record at the August 14, 2024, hearing, the Court finds that the circumstances of these cases warrant granting the relief provided below.

IT IS ORDERED that, except as otherwise provided in any order of the Court, professionals employed in this bankruptcy case, including Fredrikson & Byron, P.A., shall be permitted to seek interim payment of compensation and reimbursement of expenses by filing monthly applications for interim compensation and reimbursement of expenses.

IT IS FURTHER ORDERED that Debtors are authorized to pay all reasonable amounts invoiced by Lighthouse Management Group, Inc. ("Lighthouse") for fees and expenses on a bi-weekly basis.

IT IS FURTHER ORDERED that Lighthouse will file with the Court and serve on Debtors, the United States Trustee, and any statutory committee appointed in this case (the "Notice Parties") a monthly staffing report, filed and served by the 20th of each month for the previous month, identifying the Lighthouse employees who worked on this case, the total hours billed by Lighthouse, and a summary of the tasks performed. Lighthouse will also file with the Court and serve on the Notice Parties a quarterly compensation report by the 20th of each month following the end of a quarter, showing the total fees and expenses for the preceding quarter. These reports will be deemed applications for interim compensation under sections 328 and 330. Parties in interest may object to the reports within 21 days after notice. The Court will rule on the applications after the deadline to object passes or after a hearing on the application.

IT IS FURTHER ORDERED that Debtors will allocate the fees and expenses approved among Debtors pro rata if the professionals charge for tasks that generally apply to all cases and to the appropriate Debtor if the tasks relate solely to a specific Debtor.

Dated: August 14, 2024.



SHON HASTINGS, JUDGE
UNITED STATES BANKRUPTCY COURT

EXHIBIT C

Stinson LLP

Invoice Detail

File No. 3531668.0002
Invoice No: 43646762

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Timekeeper Summary

Timekeeper	Title	Rate	Hours	Amount
Benjamin Court	Partner	565.00	8.00	4,520.00
C.J. Harayda	Partner	565.00	18.00	10,170.00
Miranda Swift	Associate	385.00	7.60	2,926.00
Shelby Kostolni	Associate	395.00	7.60	3,002.00
Stephanie Hess	Paralegal	265.00	0.50	132.50
Current Professional Services			41.70	\$20,750.50

Professional Services

Date	Task	Description/Timekeeper	Hours	Amount
B100 - Administration				
06/03/25	B100	Email correspondence with Delta hotel and case team regarding meeting with unsecured creditors on June 9. Stephanie Hess	0.50	132.50
Total B100 - Administration				0.50
B110 - Case Administration				
06/02/25	B110	Review and update claims transfer summary sheet. Shelby Kostolni	0.10	39.50
06/02/25	B110	Telephone conference with Ms. Swift to discuss creditors meeting logistics. Shelby Kostolni	0.10	39.50
06/03/25	B110	Coordinate various items for meeting of creditors in Fargo (.1); communications regarding same and conference room (.1) C.J. Harayda	0.20	113.00
06/03/25	B110	Coordinate with Stinson team for creditor meeting logistics. Shelby Kostolni	0.20	79.00
06/04/25	B110	Compile creditor meeting RSVP list. Shelby Kostolni	0.90	355.50
06/05/25	B110	Update RSVPs for creditor meeting.	0.20	79.00

Stinson LLP
Invoice Detail

File No. 3531668.0002
Invoice No: 43646762

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Date	Task	Description/Timekeeper	Hours	Amount
		Shelby Kostolni		
06/06/25	B110	Update RSVPs for creditor meeting and confirm receipt of RSVPs. Shelby Kostolni	0.30	118.50
06/06/25	B110	Summarize adversary proceedings and settlements for creditor meeting. Shelby Kostolni	0.60	237.00
06/08/25	B110	Expand summaries of adversary proceeding with each involved party for creditor meeting. Shelby Kostolni	0.40	158.00
06/09/25	B110	Update RSVP lists for creditor meeting. Shelby Kostolni	0.20	79.00
06/23/25	B110	Exchange emails with representatives of Hain Capital regarding participation involving liquidation trust Committee. Benjamin Court	0.20	113.00
06/23/25	B110	Review and summarize May monthly operating reports of the debtors. Shelby Kostolni	0.50	197.50
Total B110 - Case Administration			3.90	1,608.50

B150 - Meetings of and Comm. with Creditors

06/02/25	B150	Discussion with Ms. Kostolni regarding preparation for June 9 meeting (.3); correspondence with various creditors including Ms. Klein, Ms. Wieber, Ms. Holmes, Mr. Gillis, and Mr. Schmidt (1.3). Miranda Swift	1.60	616.00
06/05/25	B150	Telephone conference with Mr. Gomke regarding June 9 meeting (.2); correspondence regarding preparations for June 9 meeting (.1). Miranda Swift	0.30	115.50
06/08/25	B150	Outline and summarize Plan and Disclosure Statement in preparation for unsecured creditor meeting (.6); review attendee list and prior communications sent regarding meeting and correspondence regarding same	1.10	423.50

Stinson LLP
Invoice Detail

File No. 3531668.0002
Invoice No: 43646762

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Date	Task	Description/Timekeeper	Hours	Amount
		(.5). Miranda Swift		
06/09/25	B150	Review, analyze, and evaluate debtors' disclosure, statement, plan of reorganization, objections filed by creditors, updates regarding status of various development projects, project company claims and defenses asserted, and economic analysis regarding same (1.8); attend creditor meeting and present to creditors regarding plan and disclosure statement issues, updates regarding recovery efforts, and proposed next steps (2.1); follow up discussions with several creditors and Committee members regarding plan and recovery issues (.5); review and analyze question creditor questions submitted in advance of meeting (.2). Benjamin Court	4.70	2,655.50
06/09/25	B150	Prepare for meeting with creditors group in Fargo (1.5); conference with Mr. Court regarding same (.4); transit to Fargo (2.4) coordinate and participate in large creditor group meeting and questions (2.5). C.J. Harayda	6.80	3,842.00
06/09/25	B150	Prepare for, including calls and emails with creditors, and virtually attend meeting with unsecured creditors. Miranda Swift	2.20	847.00
06/09/25	B150	Attended and monitored creditor meeting via Zoom. Shelby Kostolni	1.80	711.00
06/10/25	B150	Answer questions from creditors regarding Disclosure Statement and Plan. Miranda Swift	0.60	231.00
06/11/25	B150	Correspondence with creditor regarding disclosure statement and plan. Miranda Swift	0.40	154.00
06/16/25	B150	Communications with Committee members regarding liquidating trust and related issues. C.J. Harayda	0.20	113.00
06/17/25	B150	Exchange emails with unsecured creditor regarding claim information and potential evidence to review regarding possible targets (.3); exchange emails with Hain Capital representative regarding liquidating trust issues (.2).	0.50	282.50

Stinson LLP

Invoice Detail

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Date	Task	Description/Timekeeper	Hours	Amount
		Benjamin Court		
06/19/25	B150	Conference with Committee regarding various plan and trust issues and questions (1.1); communications with counsel for the debtors regarding same (.2). C.J. Harayda	1.30	734.50
06/30/25	B150	Answer creditor's question regarding plan payments (Langseth). Miranda Swift	0.10	38.50
Total B150 - Meetings of and Comm. with Creditors			21.60	10,764.00
B160 - Fee/Employment Applications				
06/02/25	B160	Prepare revisions to application for compensation. Benjamin Court	0.40	226.00
06/02/25	B160	Finalize and file ninth interim fee application. Shelby Kostolni	0.20	79.00
06/13/25	B160	Revisions and analysis to Fee Application for May. Miranda Swift	0.20	77.00
06/13/25	B160	Further revisions to Fee Application for May. Shelby Kostolni	0.60	237.00
06/17/25	B160	Draft fee application and supporting documents. Shelby Kostolni	0.80	316.00
06/25/25	B160	Finalize fee application for filing. Shelby Kostolni	0.20	79.00
Total B160 - Fee/Employment Applications			2.40	1,014.00
B190 - Other Contested Matters				
06/04/25	B190	Review and update summary on adversary proceeding statuses. Shelby Kostolni	0.30	118.50
Total B190 - Other Contested Matters			0.30	118.50

Stinson LLP

Invoice Detail

File No. 3531668.0002
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Date	Task	Description/Timekeeper	Hours	Amount
B310 - Claims Administration and Objections				
06/17/25	B310	Update claims transfer summary. Shelby Kostolni	0.20	79.00
Total B310 - Claims Administration and Objections			0.20	79.00
B320 - Plan/Disclosure Statement Incl. Bus Plan				
06/05/25	B320	Review and analyze two filed disclosure statement objections. Benjamin Court	0.50	282.50
06/05/25	B320	Coordinate preparation and filing of no reply (.1); communications regarding same; review objections to disclosure statement (.7). C.J. Harayda	0.80	452.00
06/06/25	B320	Review and summarize key provisions of Plan and Disclosure Statement and correspondence regarding same. Miranda Swift	1.10	423.50
06/10/25	B320	Address disclosure statement hearing issues, potential revisions to the same, and plan confirmation issues (.6). Benjamin Court	0.60	339.00
06/10/25	B320	Prepare for and participate in hearing on Disclosure Statement (2.2); prepare and submit motion for remote appearance (.5); travel return for creditor meeting (2.0) provide update to Committee regarding hearing and next steps (.7). C.J. Harayda	5.40	3,051.00
06/11/25	B320	Communications with Committee members regarding disclosure statement (.6); review updated DS for submission to court (.4); communications with S. Kinsella regarding same (.2); review updated filed pleadings (.2). C.J. Harayda	1.40	791.00
06/12/25	B320	Review communications regarding plan trust administration and discuss with Mr. Court. C.J. Harayda	0.10	56.50

Stinson LLP

Invoice Detail

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Date	Task	Description/Timekeeper	Hours	Amount
06/16/25	B320	Exchange emails with members of unsecured creditors Committee regarding disclosure statement modifications, plan confirmation issues, and liquidating trust issues (.3); exchange emails with representatives of Hain Capital regarding trust Committee representation issues (.2). Benjamin Court	0.50	282.50
06/18/25	B320	Review substantive consolidation motion; analyze issues regarding plan trust governance. C.J. Harayda	0.30	169.50
06/19/25	B320	Phone conference with Committee members to address disclosures requested by Court, plan confirmation scheduling issues, trust Committee representation issues, update regarding status of litigation and settlements involving project companies, and discussion of potential post-confirmation litigation targets and options. Benjamin Court	0.60	339.00
06/24/25	B320	Conferences with Hain Capital and Debtor regarding plan and trust setup (.5); analyze issues regarding same (.1); draft and revise fee application (.5). C.J. Harayda	1.10	621.50
06/25/25	B320	Communications with Hain capital (.1); review recent pleadings and claims trades (.1). C.J. Harayda	0.20	113.00
06/30/25	B320	Analyze issues regarding Committee membership (.1); communications with S. Kinsella and Z. Frappier regarding project negotiations (.1). C.J. Harayda	0.20	113.00
Total B320 - Plan/Disclosure Statement Incl. Bus Plan			12.80	7,034.00
Current Professional Services			41.70	\$20,750.50

Stinson LLP

Invoice Detail

File No. 3531668.0002
Invoice No: 43646762

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Task Code Summary

Task Code	Description	Hours	Amount
B100	Administration	0.50	132.50
B110	Case Administration	3.90	1,608.50
B150	Meetings of and Comm. with Creditors	21.60	10,764.00
B160	Fee/Employment Applications	2.40	1,014.00
B190	Other Contested Matters	0.30	118.50
B310	Claims Administration and Objections	0.20	79.00
B320	Plan/Disclosure Statement Incl. Bus Plan	12.80	7,034.00
Current Professional Services		41.70	\$20,750.50

Disbursements

Date	Description	Amount
06/09/25	Hotel-Lodging on 6/9/2025-6/10/2025 Travel to ND to attend Committee meeting	244.20
06/10/25	Delta Hotel Conference Room for Attorney Meeting with Unsecured Creditors on Invoice 0725 0440 Kugler	1,230.25
06/10/25	Mileage for Benjamin J Court for travel for 470 Miles (Minneapolis to Fargo) - Attend Committee Meeting ^470.00 miles	329.00
06/10/25	Hotel - Lodging on 06/09/2025 - 06/10/2025 Hotel - Attend Committee Meeting	218.29
Total Disbursements		\$2,021.74